PROGRAM SECTION III --- Universal Waste

1. Regulatory citation

This Program Section for the management of Universal Waste has been developed to comply with 6 NYCRR 374-3.

2. Applicability

The program Section was developed specifically for the facilities operations departments at all of the Departments listed below at the locations indicated which generate wastes for the reasons indicated.

Facility Operations – Spent lamps, spent batteries and waste mercury thermostats.
   - Rose Hill
   - Lincoln Center

3. Registration and reporting requirements

There is no registration or reporting requirement associated with small quantity handlers of Universal Waste. Small quantity handler of universal waste is one who does not accumulate more than 5,000 kg (11,000 lbs) or more of total universal waste at any time. All three campuses will arrange for universal waste pick-ups at a frequency as to avoid becoming a large quantity handler.

4. Waste Analysis

Universal waste rules only apply to thermostats containing mercury, lead acid storage batteries, and uncrushed florescent lamps. If lamps are crushed, they are to be managed as described in Program Section VI – Recyclable Waste.

5. Management

   a. Administration

   Compliance with the requirements of this program is the responsibility of the individuals filling the below listed positions or any successor to these positions.

   - Facilities Operations – Rose Hill    Director
   - Facilities Operations – Lincoln Center    Director

   The Program Administrator will inspect, audit and advise these Department representatives.
b. Storage

Universal waste is accumulated and stored on-site for no more than one year from the date the waste is generated. This one year period begins the first time waste is deposited in the accumulation area after the last pick-up. This date must be clearly marked as a wall posting in the accumulation area. The designated accumulation areas for universal waste are as follows.

Rose Hill: Garage Facilities storage area
Lincoln Center: Storage room near the loading dock in McMahon Hall.

The following outlines some specific requirements for each type of universal waste.

i) Lead Acid Storage Batteries

Batteries must be stored in a way that prevents releases of any of its components to the environment. Leaking or damaged batteries must be contained so as to prevent spillage. The storage area or containers must be clearly marked as “Universal Waste Batteries” or “Waste Batteries” or “Used Batteries”.

ii) Thermostats Containing Mercury

Any thermostat that shows evidence of leakage or damage must be contained so as to prevent spillage. The storage area or containers must be clearly marked as “Universal Waste Mercury Thermostats” or “Waste Mercury Thermostats” or “Used Mercury Thermostats”. The mercury-containing ampules may be removed from thermostats provided it is done so as to prevent breakage. This must be done over a containment device in the event of a spill.

iii) Florescent Lamps

Lamps must be stored in closed containers or packages that are structurally sound and adequate to prevent breakage. Any broken lamp must be immediately cleaned up and put into a container. The storage area or containers must be clearly marked as “Universal Waste Lamps” or “Waste Lamps” or “Used Lamps”.

c. Training

All persons involved in the handling of universal waste must receive training which covers this universal waste management plan as well as the use of safety equipment, spill clean up materials and equipment, fire prevention equipment, and container labeling nomenclature.
d. Record Keeping

A small quantity handler of universal waste is not required to keep records of shipments.

e. Disposal

All universal waste must be picked up by a universal waste transporter for disposal at either another universal waste handling facility or a destination facility. Each department should arrange for universal pickups either contracting directly with a transporter or by contacting the university EHS Officer. The EHS Officer will work closely with the department to arrange for the pickup by a universal waste transporter.

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